## **EXHIBIT B**

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS TYLER DIVISION

SIPCO, LLC,	)
Plaintiff,	) )
v.	) )
	)
ABB INC.; COULOMB TECHNOLOGIES, INC.;	
ECOTOTALITY, INC.; ELECTRIC	)
TRANSPORTATION ENGINEERING,	)
CORPORATION dba ECOTOTALITY NORTH	) CIVIL ACTION NO. 6:11-CV-0048
AMERICA; ENERGY HUB, INC.; JETLUN	)
CORPORATION; INGERSOLL-RAND	)
COMPANY; INGERSOLL-RAND SCHLAGE	)
LOCK HOLDING COMPANY LLC; SCHLAGE	)
LOCK COMPANY; TRANE, INC.; and	)
SMARTLABS, INC.,	)
	)
Defendants.	)

# COULOMB TECHNOLOGIES, INC.'S PROPOSED CONSTRUCTIONS FOR DISPUTED TERMS

Defendant Coulomb Technologies, Inc. ("Coulomb"), by and through its undersigned counsel, and pursuant to P.R. 4-3, hereby discloses Coulomb's proposed definitions of the claim terms in dispute that Coulomb respectfully requests this Court to construe. Per Coulomb's agreement with Plaintiff, this submission is to be attached as an Exhibit to the Joint Statement to be filed by Plaintiff pursuant to P.R. 4-3.

Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 6,437,692

Claim Term(s)	Claim	Proposed Claim	Intrinsic	Extrinsic
	Number(s)	Construction	Evidence	Evidence
remote	1, 11, 32,	in a geographical	Abstract; Fig. 2,	
	42, 49	location separate	numerals 210,	
		from a local	220, 212, 222,	
		gateway/site	224, 216, 214,	
		controller	and 222; Fig. 5,	

			numerals 210, 550; Col. 6:15- 35; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28.	
select information	1, 2, 5, 8, 12, 32, 33	measured physical or operational condition	Abstract; Col. 3:2-7; Col. 5:60-64; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:48-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by Applicant).	
a remotely located device	1, 32	a device different from a transceiver or transmitter and which is not an intermediate device, where the device is in a geographical location separate from a local gateway/site controller	Abstract; Fig. 2, numerals 210, 220, 212, 222, 224, 216, 214, and 222; Fig. 5, numerals 210, 550; Col. 6:15-30; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507,	

wireless transmitter configured to transmit select information	1, 3, 18, 24,	a one-way communication device integrated with a remote sensor that sends, over the air, physical or operational conditions measured by the sensor	Response to Office Action, May 3, 2010, p. 16.  Abstract; Col. 3:2-7; Col. 5:60-64; Col. 7:17-25; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:41-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; Col. 17:23-42; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by Applicant).  Col. 3:7-10; Col.	Wireless
power radio frequency transceivers	1, 3, 16, 24, 34, 49, 55, 60	air signals with a transmission power of about 1.5 milliwatts	Patent; F.H. '692 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikiped ia.org/wiki/Mobi le_phone_radiati on_and_health.
translate the select	1	to map the select information to	Col. 3:66 - Col. 4:11; Col. 16:13-	

information		function codes	24; Figs. 3D, 4, 11, and 12.	
			ŕ	
integrated with a sensor	4	directly connected and assembled with a device for measuring the physical or operational condition of a remote device	Abstract; Fig. 3C; Col. 9:52-Col. 10:11; Col. 3:2-7; Col. 5:60-64; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:48-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17.	
actuator	6, 8, 24, 28, 42, 49	"an analog switch" or a "switch triggered or activated by an analog (non- digital) signal	Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Digit al.
actuator integrated with the transceiver is responsive to the control signal	8	analog switch is directly connected and assembled with the signal repeater and is activated by a control signal from the host computer	Col. 9:52-Col. 10:11; Col. 3:7- 10; Col. 7:41-57; Col. 14:66-67.	
information signal consisting of a transmitter identification code and an information field translating the	18 24, 60	a signal that only includes the identification number of a transmitter and an information field, the information field being a reserved slot in a packet for carrying a message mapping data to	Case law in support of meaning of term "consisting of" will be provided in Markman brief.  Col. 3:66 - Col.	

data		function codes	4:11; Col. 16:13- 24; Figs. 3D, 4, 11, and 12.	
applying the analog signal to an actuator	24	applying a non-digital signal to activate or turn on the analog switch	Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Digit al.
in response to a physical condition	32	in response to one of the following: a smoke condition, a temperature condition, a security breach condition, a carbon monoxide condition, a door position, vehicle diagnostics, rainfall condition, vehicle position, and a mobile inventory condition	Col. 3:2-7; Col. 5:60-64; Col. 9:14-16; Col. 9:41-45; Col. 9:57-Col. 10:2; Col. 12:48-53; Col. 13:8-10; Col. 13:36:41; and Col. 17:12-17.	
wireless transmitter	1, 3, 4, 32	a one-way communication device that generates signals to be sent over the air	Abstract; Col. 3:2-7; Col. 5:60-64; Col. 7:17-25; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:41-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; Col. 17:23-42; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by	

			Applicant).	
low power radio frequency signal	1	an over the air signal with a transmission power of 1.5 milliwatts or less	Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikiped ia.org/wiki/Mobi le_phone_radiati on_and_health.
at least one wireless low- power RF transceiver	42	at least one repeater of over the air signals having an output power of 1.5 milliwatts or less	Col. 3:7-10; Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikiped ia.org/wiki/Mobi

wireless transceiver configured to translate the RF signal to an analog output signal	42, 49	the signal repeater receives the over the air signal and outputs a non-digital signal	Col. 3:7-10	le_phone_radiati on_and_health. Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Digit al.
electrically coupled with an actuator	42, 49	physically connected to an analog switch through a conductive material	Col. 5:15-35; Fig. 1.	
translate the analog signal into a response	24	activate the analog switch	Col. 20:62-63; Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Digit al.
application system input	49	signal sent to the host computer	Abstract; Col. 2:43-54 and see definition of "gateway."	
wireless relatively low- power RF transceiver	49	repeater of over the air signals having an output power of 1.5 milliwatts or less.	Col. 3:7-10; Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies

				Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikiped ia.org/wiki/Mobi le_phone_radiati on_and_health.
the wireless transceiver electrically coupled with an actuator and a sensor	49	the repeater of over the air signals is physically connected to the analog switch and a sensor through a conductive material	Col. 5:15-35; Fig. 1; Col. 3:7- 10; Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	
information signal consisting of a transmitter code and an information field	55	a signal that only includes the identification number of a transmitter and an information field, the information field being a reserved slot in a packet for carrying a message or part of a message	Case law in support of meaning of term "consisting of" will be provided in Markman brief.	
low-power RF signal	55	an over the air signal having 1.5milliwatts of power or less	Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2,

the low-power RF signal is received and repeated as required	55	Indefinite.		(Peak RF Output Power); http://en.wikiped ia.org/wiki/Mobi le_phone_radiati on_and_health.
information signal consisting of a transceiver identification code and a concatenation of function codes	60	a signal that can only include the identification number of a transceiver and a continuous sequence of codes denoting functionality	Case law in support of meaning of term "consisting of" will be provided in Markman brief.	
gateway	1, 2, 7, 10, 11, 12, 18, 24, 32, 33, 35, 36, 42, 44, 45, 46, 49, 50, 51, 54, 55, 60	a computer geographically located apart from repeaters of over the air signals and a host computer and that interfaces those repeaters with the host computer via an Internet-like network	Abstract; Col. 3:7-10; Fig. 2, numerals 210, 220, 212, 222, 224, 216, 214, 260 and 222; Fig. 5, numerals 210, 550; Col. 2:43-54; Col. 3:20-24; Col. 3:57-65; Col. 6:15-35; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28.	

## Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 7,697,492

Claim Term	Claim	Proposed Claim	Intrinsic	Extrinsic
	Number(s)	Construction	Evidence	Evidence
communicate command and sensed data between remote	1	communicate control instructions and data corresponding to a measured physical	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; F.H.	
devices		or operational condition between devices which are different from a transceiver or transmitter and which are not intermediate devices which are at geographical locations separate from a local gateway/site controller	Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
receiver address comprising a scalable address of at least one remote device	1, 14, 25	a sequence of bytes identifying a device, different from a transceiver or transmitter and which is not an intermediate device, at a separate geographical location from a local gateway/site controller, wherein the sequence of bytes varies between 1 and 6 bytes	Fig. 8 "To Address" and Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
plurality of transceivers	2, 19	two or more devices that can both transmit and receive signals	Col. 5:17-21.	
at least one sensor associated with at least one of the transceivers to	2	at least one sensor to detect a physical or operational condition is associated with at	Col. 7:60-Col. 8:6; see definition of "plurality of transceivers."	

detect a condition		least one of the transceivers		
actuator associated with at least one of the transceivers	2	analog switch associated with at least one of the transceivers	Col. 8:7-13; Col. 7:34-38; see definition of "plurality of transceivers."	
formats the sensed data signal into scalable byte segments	4, 21	Indefinite. A byte consists of exactly 8 bits and by definition is not scalable or variable.		
a preface	5	part of a message that serves to synchronize the control system and to frame each packet of the message. The packet begins with the preface and ends with a postscript	Col. 11:6-16.	
logic level	5	the voltage corresponding to either a one bit or a zero bit (0 volts)		Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Logic _level)
a postscript	5	a page description language from Adobe Systems that offers flexible font capability and high quality graphics		Microsoft Computer Dictionary, Microsoft Press, Fifth Edition, (2002), Page 414; Bates No. CTI0019565-

				19570.
low voltage	5	zero volts		Engineering
output				Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikiped ia.org/wiki/Logic _level)
scalable data value comprising a scalable	8	Indefinite. The specification teaches the opposite, which	Fig. 7; Col. 9:50- Col. 11:56.	
message		is that a single message can be broken down into different values being carried by a		
		sequence of packets. Alternatively, this limitation may be construed to mean "a message that can be		
		communicated by breaking the message into packets, each packet having a variable		
1: 11	0.10	data field length."	G 1 2 20 25	
geographically remote	9, 19	a geographical location separate from a local gateway/ site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8;	
actuator	2, 11, 17	analog switch	Col. 8:7-13; Col. 7:34-38.	
actuator configured to	11	analog switch connected to the device to be	Col. 8:7-13; Col. 7:34-38.	

2 242 242	T	a a tirra ta al a t		
actuate		activated or turned		
		on or off		
communicate	14	communicate control	Col. 2:29-35;	
command and		instructions and data	Col. 4:18-35;	
sensed data		corresponding to a	Col. 8:52-63;	
between remote		measured physical	Col. 9:5-8; F.H.	
wireless		or operational	Reexamination	
communication		condition between	of '511 Patent,	
devices		devices which are	Application	
		different from a	Serial No.	
		transceiver or	90/010,507,	
		transmitter and	Response to	
		which are not	Office Action,	
		intermediate devices	May 3, 2010, p.	
		which are at	16.	
		geographical		
		locations separate		
		from a local		
		gateway/site		
		controller		
controller	14	a device that	Col. 2:29-35;	
configured to		controls the	Col. 4:18-35;	
communicate		operation of a	Col. 8:52-63;	
with at least one		transceiver, that	Col. 9:5-8; Col.	
other remote		device being at a	5:17-21; Col.	
wireless device		separate	5:65-Col. 6:3;	
whereas device		geographical	Col. 6:42-55;	
		location from a local	Col. 7:5-59.	
		gateway/site	Coi. 7.3 37.	
		controller, and		
		which is		
		programmed to		
		communicate with		
		other transceivers		
		that are also at a		
		separate		
		geographical		
		locations from a		
		local gateway/site		
	15	controller		
one sensor	15	See definition of "at		
configured to		least one sensor		
detect a		associated with at		
condition		least one of the		
		transceivers to detect		
		a condition."		

operatively configured to be in location from a local gateway/site controller and that is programmed to communication with at least one other of a plurality of transceivers  condition to the transceiver  condition to the transceiver  condition to the transceiver  communicate with at least another transceiver from a group of two or more signal repeaters that are also at a separate geographical locations from a local gateway/site controller  condition to the transceiver  condition to the transceiver  condition to the transceiver  communicate with at least one other remote with at least one other remote wireless device via the transceiver  operational cocation from a local gateway/site controller on poperational condition of the signal repeater  physical or operational condition of the signal repeater  operational communicate with at least one other remote wireless device via the transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  also at a geographical  controller and that is 5: Col. \$5:65-Col. 6:3; Col. 14:2-3; Col. 2:29-35; Col. 2:29-35; Col. 2:29-35; Col. 2:29-35; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.		1	1	T	
transceiver  operational condition of the signal repeater  formats the sensed data signal into scalable byte segments  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  via the transceiver  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  via the transceiver  transceiver  segment is by definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 5:17-21.  Col. 14:2-3; Col. 4:18-35; Col. 4:18-35; Col. 6:2-63; Col. 9:5-8; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.  Segment is by definition of "plurality of transceivers."  Col. 5:17-21.  Col. 6:42-55; Col. 6:42-55; Col. 7:5-59.	configured to be in communication with at least one other of a plurality of transceivers	19	geographical location from a local gateway/site controller and that is programmed to communicate with at least another transceiver from a group of two or more signal repeaters that are also at a separate geographical locations from a local gateway/site controller	Col. 8:52-63; Col. 9:5-8; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.	
formats the sensed data signal into scalable byte segments  Transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  via the transceiver  14, 25  communicate with at least one other remote wireless device via the transceiver  via the transceiver  1-4, 6, 14, 18-21, 25  communicate, via geographical location apart from the local gateway/site controller, with at least one other wireless device via the transceiver at a geographical least one other wireless device via the transceiver which is also at a geographical  condition of "plurality of transceivers."  Indefinite. A byte segment is by definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:65- Col. 6:3; Col. 6:42-55; Col. 7:5-59.		20	1		
formats the sensed data signal into scalable byte segments  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  via the transceiver  signal repeater  Indefinite. A byte segment is by definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 4:18-35; Col. 4:18-35; Col. 8:52-63; Col. 5:17-21.  Signal repeater  Indefinite. A byte segment is by definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 6:35; Col. 6:35; Col. 6:42-55; Col. 6:42-55; Col. 6:42-55; Col. 7:5-59.  Signal repeater  "plurality of transceivers."	transceiver		1 -	· · · · · · · · · · · · · · · · · · ·	
formats the sensed data signal into scalable byte segments  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  1-4, 6, 14, 18-25  communicate with at least one other remote wireless device via the transceiver  1-4, 6, 14, 18-21, 25  communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  1-4, 6, 14, 18-21, 25  a device that can both transmit and receive signals  communicate, via the transceiver at a geographical  2:29-35, Col. 4:18-35, Col. 4:18-35, Col. 5:5-8, Col. 5:5-8, Col. 5:17-21.					
sensed data signal into scalable byte segments  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  1-4, 6, 14, 18-21, 25  communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  segment is by definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 9:5-8; Col. 5:17- 21; Col. 5:65- Col. 6:3; Col. 6:42-55; Col. 7:5-59.				transceivers."	
signal into scalable byte segments  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote via the transceiver  via the transceiver  transceiver  14, 25  communicate, via the transceiver at a geographical transceiver  via the transceiver  transceiver  transceiver  definition eight bits in length and therefore is not scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17-19:10 cation apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical		4, 21	1		
scalable byte segments  in length and therefore is not scalable.  transceiver  1-4, 6, 14, 18-21, 25  communicate with at least one other remote wireless device via the transceiver  transceiver  14, 25  communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device via the transceiver  transceiver  scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17-21.  communicate via the transceiver at a geographical possible controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical			1 -		
transceiver  1-4, 6, 14, 18-21, 25  both transmit and receive signals  communicate with at least one other remote wireless device via the transceiver  via the transceiver  transceiver  transceiver  scalable.  Col. 5:17-21.  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17- 21; Col. 5:65- Controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical	scalable byte		in length and		
communicate with at least one other remote via the transceiver via the transceiver transceiver  transceiver  18-21, 25  both transmit and receive signals  communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  both transmit and receive signals  Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 9:5-8; Col. 5:17-21; Col. 5:65-21; Col. 5:65-21; Col. 5:65-21; Col. 5:65-21; Col. 5:65-21; Col. 5:5-59.	segments				
receive signals  communicate with at least one other remote wireless device via the transceiver  via the transceiver  transceiver  transceiver  receive signals  communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  receive signals  Col. 14:2-3; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17- 21; Col. 5:65- Col. 6:3; Col. 6:42-55; Col. 7:5-59.	transceiver	1-4, 6, 14,	a device that can	Col. 5:17-21.	
communicate with at least one other remote wireless device via the transceiver via the transceiver transceiver  via the transceiver  via the transceiver transceiver  via the transceiver transceiver  via the transceiver transceiv		18-21, 25			
other remote wireless device via the transceiver  geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:65- Col. 6:3; Col. 6:42-55; Col. 7:5-59.		14, 25	communicate, via		
wireless device via the transceiver  location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical  8:52-63; Col. 9:5-8; Col. 5:17- 21; Col. 5:65- Col. 6:42-55; Col. 7:5-59.				· · · · · · · · · · · · · · · · · · ·	
transceiver			1	· · · · · · · · · · · · · · · · · · ·	
controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical			the local	9:5-8; Col. 5:17-	
least one other wireless device that includes a wireless transceiver which is also at a geographical  6:42-55; Col. 7:5-59.	transceiver			, , , , , , , , , , , , , , , , , , ,	
wireless device that includes a wireless transceiver which is also at a geographical			1	, ,	
transceiver which is also at a geographical				, , , , , , , , , , , , , , , , , , ,	
also at a geographical					
geographical					
10 third in the interest of th			location apart from		

		the local		
		gateway/site		
		controller		
means for	22	Indefinite. There is		
dynamically		no corresponding		
sending and		structure in the		
receiving		specification and the		
messages		language of the		
		claim also fails to		
		recite any		
		corresponding		
		structure.		
means for		Indefinite. There is		
packaging a		no corresponding		
message		structure in the		
		specification and the		
		language of the		
		claim also fails to		
		recite any		
		corresponding		
		structure.		
means for	22, 23	The structure		
communicating		corresponding to this		
information		term seems to		
		correspond to		
		elements 340 in Fig.		
		3 and 500 in Fig. 5		
		(including reference		
		to these elements in		
		the written		
		description).		
means for	22	The structure		
receiving		corresponding to this		
messages		term seems to		
		correspond to		
		elements 328 in Fig.		
		3 and 530 in Fig. 5		
		(including reference		
		to these elements in		
		the written		
		description).		
means for	22	Indefinite. There is		
preparing		no sufficient		
responses to the		structure disclosed		
received		in the specification		
10001104	1	in the specification	l	

	1	T	T	
message		and the language of		
		the claim also fails		
		to recite any		
		corresponding		
		structure. The		
		structure that seems		
		to correspond to this		
		term relates		
		elements 324 in Fig.		
		3 and 535 in Fig. 5		
		(including reference		
		to these elements in		
		the written		
		description)		
means for	22	The structure		
sending the		corresponding to this		
response		term seems to		
message		correspond to		
		elements 328 in Fig.		
		3 and 530 in Fig. 5		
		(including reference		
		to these elements in		
		the written		
		description).		
means for	22	The structure		
indicating a total		corresponding to this		
number of		term seems to		
packets in a				
-		correspond to		
message		element 720 in Fig.		
		7 (including		
		reference to that		
		element in the		
		written description).		
means for	22	Indefinite. There is		
alerting a		no corresponding		
recipient to an		structure in the		
incoming packet		specification and the		
		language of the		
		claim also fails to		
		recite any		
		corresponding		
		structure.		
means for	22	The structure		
	22			
indicating an end		corresponding to this		
of a packet		term seems to		
		correspond to		
			l	

	element 740 in Fig.	
	7 (including	
	reference to that	
	element in the	
	written description).	

### Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 7,103,511

Claim Term	Claim	<b>Proposed Claim</b>	Intrinsic	Extrinsic
	Number(s)	Construction	Evidence	Evidence
remote devices	1, 8, 13, 20, 27, 33, 44, 56	devices which are different from a transceiver or transmitter and which are not intermediate devices and that are geographically apart from a local gateway/site controller	Abstract; Fig. 4, numerals 416, 418; Col. 2:28-47; Col. 5:7-12; Col. 5:57-61; Col. 10:40-48; Col. 11:8-33; Col. 14:49-59; Col. 21:52-58; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	Evidence
plurality of wireless transceivers	1-3, 6, 7, 9, 13-15, 18- 22, 25-27, 37, 44, 45, 46, 51, 52	two or more repeaters of over the air signals	Abstract; F.H. Reexamination '511 Patent, Application Serial No. 90/010507, Response to Office Action, September 1, 2010, p. 12; See Col. 3:7-10, '692 Patent.	
receive a sensor data signal from one of the plurality of	1, 8, 13, 20	receive measured physical or operational condition data from	Abstract; Fig. 4, numerals 416, 418; Col. 2:28- 47; Col. 5:7-12;	

		0.1	Q 1 # #F	
remote devices		one of the at least	Col. 5:57-61;	
		two devices which	Col. 7:32-34;	
		are different from a	Col. 10:40-48;	
		transceiver or	Col. 11:8-33;	
		transmitter and	Col. 14:49-59;	
		which are not	Col. 21:52-58;	
		intermediate devices	Col. 17:12-20;	
		and that are	Col. 4:52-55;	
		geographically apart	F.H.	
		from a local	Reexamination	
		gateway/site	of '511 Patent,	
		controller	Application	
		Controller	Serial No.	
			90/010,507,	
			Response to	
			Office Action,	
			, , , , , , , , , , , , , , , , , , ,	
			May 3, 2010, p.	
	1 2 0 10		16.	
original data	1-3, 8-10,	message containing	Abstract; Col.	
message	13, 14, 20,	information about	2:59-60; Col.	
	21, 27, 44-	the physical or	3:15-16; F.H.	
	46	operational	Reexamination	
		condition of a	of '511 Patent,	
		device as well as the	Application	
		identification	Serial No.	
		number of the	90/010,507,	
		sensor	Response to	
			Office Action,	
			May 3, 2010, p.	
			16. See also	
			definition for	
			"receive a sensor	
			data signal from	
			one of the	
			plurality of	
			remote devices."	
transmit a	1, 2, 8, 13,	repeat or relay a	Abstract; Col.	
repeated data	14, 20, 21,	message that	2:59-60; Col.	
message	45	includes information	3:15-16; Col.	
message	T-J	about the physical or	23:54-57; F.H.	
		operational	Reexamination	
		condition of a		
			of '511 Patent,	
		device and at least	Application	
		one of the	Serial No.	
		identification	90/010,507,	
		number of the	Response to	

	1	1		
		sensor or the	Office Action,	
		identification	May 3, 2010, p.	
		number of the	16.	
		repeater		
site controller	1, 3, 13, 15,	a computer	Abstract; Col.	
	27, 30-34,	geographically	5:57-66.	
	42, 44, 46,	located apart from		
	49, 53-57	repeaters of over the		
	, , , , , , ,	air signals and a host		
		computer and that		
		interfaces those		
		repeaters with the		
		host computer via an		
		Internet-like		
		network		
information	1 0 27	information related	Abstract: Fig. 4	_
related to the	1, 8, 27	to the measured	Abstract; Fig. 4,	
			numerals 416,	
sensor data		physical or	418; Col. 2:28-	
signal		operational	47; Col. 5:7-12;	
		condition of a	Col. 5:57-61;	
		device different	Col. 7:32-34;	
		from a transceiver or	Col. 10:40-48;	
		transmitter and	Col. 11:8-33;	
		which is not an	Col. 14:49-59;	
		intermediate device	Col. 21:52-58;	
			Col. 17:12-20;	
			Col. 4:52-55;	
			F.H.	
			Reexamination	
			of '511 Patent,	
			Application	
			Serial No.	
			90/010,507,	
			Response to	
			Office Action,	
			May 3, 2010, p.	
			16.	
host computer	1, 8, 13, 20,	a central computer at	Col. 1:31-36;	
1	27, 44	a geographical	Col. 2:48-3:29;	
		location apart from	Col. 19:15-20.	
		both a local		
		gateway/site		
		controller and		
		devices to be		
		controlled by that		
		central computer.		
	1	computer.		

	2 14 21		A 144- T2* 4	
repeaters	2, 14, 21,	intermediate, as	Abstract; Fig. 4,	
	36, 45, 59	opposed to remote,	numerals 416,	
		"transceivers" or	418; Col. 2:28-	
		"intermediate	47; Col. 5:7-12;	
		communication	Col. 5:57-61;	
		devices that relay	Col. 10:40-48;	
		over the air signals	Col. 11:8-33;	
		to/from remote	Col. 14:49-59;	
		devices and a site	Col. 21:52-58.	
		controller"		
wherein the	3, 10	"original data	Col. 9:15-32.	
original data		message" is		
message		generated in		
corresponds to		response to a		
the command		command from the		
		host controller		
message	0			
wireless	8	The structure		
communication		corresponding to		
means		this term seems to		
configured to		correspond to		
receive a sensor		elements 135 and		
data signal		225 in Fig. 2		
		(including reference		
		to those elements		
		element in the		
		written description).		
sensor data	1, 2, 8, 9,	See definition for		
signal	13, 14, 20,	"information related		
~- <del>8</del>	21, 27, 44	to the sensor data		
	21, 27,	signal."		
means for	8	The structure		
receiving each of	0	corresponding to		
		1 0		
the original data		this term seems to		
messages and the		correspond to site		
repeated data		controller A 150 in		
messages		Fig. 10 (including		
		reference to that		
		element in the		
		written description).		
means for	8	The structure		
identifying, for		corresponding to		
each received		this term seems to		
message		correspond to		
		elements 414, 406,		
		416, and 404 in Fig.		
		4 (including		
	<u> </u>	. (	<u> </u>	

		reference to those
		elements in the
		written description).
means for	8	Indefinite. There is
providing		not sufficient
information		structure disclosed
		in the specification
		and the language of
		the claim also fails
		to recite any
		corresponding
		structure.
each of the	9	The structure
plurality of		corresponding to
repeating means		this term seems to
repeating means		correspond to
		elements 125 in Fig.
		10 and elements 125
		in Fig. 11 (including
		reference to that
		element in the
C	0	written description).
means for	9	Indefinite. There is
receiving the		no sufficient
original data		structure disclosed
message		in the specification
		and the language of
		the claim also fails
		to recite any
		corresponding
		structure. The
		structure that seems
		to correspond to this
		term relates
		elements 125 in Fig.
		10 and 125 in Fig.
		11 (including
		reference to these
		elements in the
		written description)
means for	9	Indefinite. There is
transmitting a		no sufficient
repeated data		structure disclosed
message		in the specification
111000450		and the language of
		the claim also fails
		the claim also falls

		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates	
		elements 125 in Fig.	
		10 and 125 in Fig.	
		11 (including	
		reference to these	
		elements in the	
C	10	written description).	
means for	10	Indefinite. There is	
providing a		no sufficient	
command		structure disclosed	
message		in the specification	
		and the language of	
		the claim also fails	
		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates element	
		110 in Fig. 10 and	
		110 in Fig. 11	
		(including reference	
		to these elements in	
		the written	
	4.4	description).	
command means	11	Indefinite. There is	
for specifying a		no sufficient	
predefined		structure disclosed	
command code		in the specification	
		and the language of	
		the claim also fails	
		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates to	
		command byte 506	
		and command code	
maons for	12	08 in the figures.	
means for	12	Indefinite. There is	

<u></u>	1	T	T
indicating a total		no sufficient	
number of bytes		structure disclosed	
in the current		in the specification	
packet		and the language of	
		the claim also fails	
		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates to	
		element 540 in Fig.	
C	10	5.	
means for	12	Indefinite. There is	
indicating the		no sufficient	
total number of		structure disclosed	
packets in the		in the specification	
current message		and the language of	
		the claim also fails	
		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates to	
		element 530 in Fig.	
		5.	
means for	12	Indefinite. There is	
identifying the		no sufficient	
current packet		structure disclosed	
current packet		in the specification	
		and the language of	
		the claim also fails	
		to recite any	
		corresponding	
		structure. The	
		structure that seems	
		to correspond to this	
		term relates to	
		element 520 in Fig.	
		5.	
means for	12	Indefinite. There is	
identifying the		no sufficient	
current message		structure disclosed	
		in the specification	
		and the language of	
Ĺ	L		

		the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to element 550 in Fig. 5.		
integrated	27	directly connected and within the same enclosure or encasing	Fig. 2; Col. 5:57-61.	

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## **EXHIBIT B**